RCRA CONTINGENCY PLAN

US Ecology Nevada

October 2009

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SECTION 7

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CONTINGENCY PLAN

7.1.0 Facility Description

US Ecology Nevada (USEN) operates a waste management facility in the Amargosa Desert 11 miles south of Beatty, Nevada. Wastes accepted on-site include RCRA hazardous wastes, PCBs regulated under the TSCA, and non-hazardous wastes.

In the event that an emergency condition occurs that has the potential to threaten human health or the environment, the following contingency plan will be implemented until the condition has been stabilized.

7.2.0 Emergency Coordinator

The Facility Manager appoints the primary and alternate Emergency Coordinators (EC). An EC is on site or readily available 24 hours a day, 7 days a week. When the Contingency Plan is implemented, the EC is authorized to commit the resources needed to carry out the Contingency Plan. The EC Phone Number List (Appendix A) contains all emergency notification telephone numbers.

7.3.0 Implementation of the Facility Contingency Plan

Employees¹ will immediately notify the EC upon identifying any fire, explosion or release of hazardous waste or constituents which could threaten human health or the environment.

Upon notification and verification that one of these events has occurred, the EC² will implement the Contingency Plan, or delegate responsibilities to other facility employees, such as the Lab Manager for waste identification, the Environmental Manager for external notifications, the Health & Safety Coordinator for traffic control or selection of appropriate PPE.

7.3.1 Fire and/or Explosion Involving Hazardous Materials

A "fire that could threaten human health or the environment" is defined as combustion of waste such that it is not readily controllable by facility personnel using on-site equipment and/or available fire extinguishing material (e.g.; fire extinguishers, water, dirt). Incidental fires in non-waste management areas or in controlled areas, such as the stabilization pan, which can be readily extinguished, may be an "incident" for purposes of this plan if they pose a threat to human health or the environment.

In the event of a fire and/or explosion requiring implementation of the Contingency Plan, the following actions will take place:

Including, for the purposes of this plan, any off-hour security employees or contractors.

- 1. The EC will notify all facility personnel by activating the emergency alarm. This is the primary emergency notification system.
- 2. When the emergency alarm is activated:
 - A. All key personnel in possession of FM radios will immediately establish voice communication with the EC.
 - B. The EC will determine which facility operations might likely be impacted by emergency response activities and will instruct those operations to cease or otherwise alter their operations, as appropriate.
 - C. If directed by the EC, all personnel will proceed to their designated emergency muster areas. If feasible, operators in the LTTD area will be assigned to monitoring the current treatment cycle after being accounted for.
 - D. If and as directed by the EC, incoming vehicular traffic will be halted or reduced, with the exception of emergency assistance traffic, if required.
- 3. Injured personnel will be immediately removed to a safe location, and qualified personnel will administer appropriate first aid. **Note**: Employees requiring medical treatment will be transported to the appropriate medical facility by any means necessary, as determined by the extent of their injuries.
- 4. All movement to the emergency muster area will be via an up-wind route. An up-wind route may be established by watching any visual emissions or wind socks. If movement via an up-wind route is not possible, the affected personnel will notify the EC of the situation.
- 5. The EC will account for all personnel, visitors and contractors.
- 6. The EC will begin assessment of the incident through observations for the following criteria:
 - The nature and extent of the incident (fire and/or explosion, and magnitude);
 - The location of the incident;
 - The nature and quantities of materials involved (review of waste profiles, manifests, disposal records, computer records, cell coordinates);
 - The potential for escalation through subsequent explosions or the spread of fire to other hazardous materials;
 - The intensity of the fire or explosion;
 - The extent of released material to the air and immediate surrounding area;
 - Wind direction and relative speed;
 - The potential for short and long-term effects, with regards to human health and the environment;
 - The need for additional outside assistance and/or evacuation. (NOTE: No firefighting will be attempted if there is significant risk of injury to facility

- personnel. Normally, only outbreak stage fires, which can be rapidly contained and controlled, will be handled);
- The proper extinguishing medium for the fire will be established by the EC (e.g., foam, dry chemical, water, soil, etc.);
- If the EC, determines that 1) the fire and/or explosion threatens human health and the environment outside the facility boundaries; 2) additional outside assistance is necessary to bring the incident under control; or 3) evacuation of local the area is necessary; the EC will immediately establish communication with local emergency response agencies, as appropriate, in accordance with Section 7.0 of this plan. Emergency telephone numbers can be found in the EC Phone Number List (Appendix A).
- 7. If the EC determines that the potential for an impending explosion is high, the EC will notify local emergency response agencies for assistance.
- 8. The EC will direct all on-scene USEN response efforts and, as appropriate and necessary, coordinate activities involving outside agencies. The EC will direct the following response efforts, as appropriate and necessary:
 - Ensure all personnel not required for response efforts are evacuated to a safe area (i.e., non-essential personnel, visitors, contractors.);
 - Establish necessary lines of communication;
 - Provide all necessary PPE;
 - Continually monitor the affected areas through observation for sign of escalation, release, or impending explosions due to gas or vapor build-up;
 - Monitor piping systems and tanks if those areas are involved or threatened;
 - Ensure all feed lines to the PCB storage tanks and LTTD propane tank are closed, if necessary and possible;
 - Limit or restrict the use of motor vehicles in the affected area to avoid ignition or re-ignition of flammable vapors and/or gases;
 - If practical, remove or isolate any waste containers or shipments that could become involved if the situation escalates or if the waste containers or shipments would be detrimental to the present situation;
 - Collect and/or contain, to the extent practical, any released waste; and / or
 - Construct soil dikes and/or barrier walls to serve as firebreaks and as temporary segregation measures, to prevent the spread of fire to other waste containing areas, and to control run-off discharge from the facility. These structures will be constructed utilizing heavy equipment as long as the operation of such equipment will not increase the potential for ignition or re-ignition of any flammable vapors.

- 9. Upon recovery from the emergency, the EC will ensure that all contaminated emergency equipment will be decontaminated. Decontamination procedures will typically be conducted on the Decon Pad to ensure that cleaning residues are contained and collected for appropriate management.
- When the incident has been brought under full control, and no longer presents a threat to human health or the environment, the EC will initiate appropriate remedial clean-up operations.

7.3.2 Sudden or Non-Sudden Releases or Spills of Hazardous Materials

For purposes of this section, a "release or spill" is defined as 55 gallons or more of material (liquid or solid) outside of its container or tank not on sacrificial soils or contained within other containment structures. For materials on sacrificial soils or inside a containment structure, a spill or release will be considered to have occurred if the material poses a threat to other materials within the same containment unit.

In the event that an Reportable Quantity release or spill occurs at the facility, the EC will take the following actions:

- 1. Determine internal notification requirements and ensure such notifications are made;
- 2. Determine which facility operations might be impacted by emergency response activities and instruct those operations to cease or alter their operations, as necessary.
- Assess the incident through observation, for the following criteria:
 - The nature and extent of the incident;
 - The location of the incident:
 - The nature and quantities of the materials involved (review of waste profiles, manifest, computer records, disposal records, truck placards, etc.);
 - Wind direction and relative speed;
 - The potential for short and long-term effects, with regards to human health and the environment:
 - The potential for fire and/or explosion; and
 - The need for additional outside assistance and/or evacuation.
- 4. If the EC determines that 1) the incident threatens human health and the environment outside the facility boundaries; 2) additional outside assistance is necessary to bring the incident under control; or 3) evacuation of the local area is necessary; the EC will establish communications with local emergency response agencies, as appropriate. The EC will also contact the NvDEP and the NRC, as necessary, in accordance with Section 7.0 of this plan. Emergency telephone numbers can be found in the EC Phone Number List (Appendix A).

- 5. The EC will direct all on-scene USEN response efforts and, as appropriate, coordinate activities involving outside agencies. The EC will direct the following response efforts, as appropriate and necessary:
 - If the incident involves the PCB processing area, all feed lines to the storage tanks will be closed;
 - If the incident involves the LTTD Unit, the system is to be monitored and shut down using the emergency shut down procedure;
 - If the surrounding materials could be reactive with the released waste, the EC will ensure they are removed to a safe location; and
 - If the incident involves leaking containers, the EC will ensure that the containers are appropriately managed.
- 6. Upon recovery from the emergency, the EC will ensure that all contaminated emergency equipment will be collected for decontamination. Decontamination procedures will typically be conducted on the Decon Pad to ensure that cleaning solutions are contained and collected for disposal.
- 7. When the incident has been brought under full control, and no longer presents a threat to human health or the environment, the EC will initiate appropriate remedial clean-up operations.

7.3.3 Remedial Clean-Up Operations

When the emergency has been brought under control and the threat to human life or the environment has been minimized, the EC will immediately initiate the following remedial actions, as appropriate, in order to restore the facility to operational readiness:

- The entire area involved in the incident will be cordoned off and only those operations directly related to the remedial clean-up will be allowed in that area. No waste disposal, storage or treatment will be conducted in the cordoned-off area until clean-up operations are completed and permission to resume normal facility operations in the area is granted by the EC.
- 2. The EC will continue to monitor the area during remedial operations. Monitoring will be through observation and direct reading instruments, such as a combustible gas/oxygen meter, if necessary. Monitoring will be conducted for the presence of gas or vapor build-up, which could cause fire and/or explosion, if necessary.
- 3. The EC will ensure that all remedial operational personnel are properly equipped with necessary PPE.
- 4. All recovered waste, contaminated soil or other solid material resulting from the incident will be appropriately stored, treated, and / or disposed.

- 5. The EC will ensure that no waste that may be incompatible with the released or recovered material is treated, stored or disposed of in the affected area, until remedial clean-up procedures are completed.
- 6. When all spilled, released or fire-fighting liquids have been removed, the EC will have the area soil sampled and analyzed to ensure that the foreign material has been removed and no further contamination exists, as appropriate. The sampling will be as follows:
 - A minimum of two samples will be taken. This number will vary with the size and extent of the spill.
 - A sample will be taken from outside the periphery of the spill (background) and from the center of the spill (confirmation of clean-up).
 - Depth of samples will be determined by the EC based on visual observation.
 - Specific analysis will depend on materials involved.
- 7. Clean-up of any spill involving regulated PCBs will be conducted following the U.S. Environmental Protection Agency's (EPA's) Spill Clean-Up Policy.
- 8. All necessary reports will be submitted to the applicable agencies, informing them of the incident and all response measures taken to re-establish normal facility operations.
- When remedial clean-up measures have been completed, the EC will ensure that the emergency equipment listed in the contingency plan is decontaminated, cleaned and fit for its intended use, before resuming normal operations. Other decontamination operations include:
 - A. Disposable PPE will be appropriately managed.
 - B. Respiratory protection equipment will be inspected and decontaminated, if necessary. Any required maintenance will be performed before reuse.
 - C. Heavy equipment (e.g., dozers, front-end loaders, forklifts, etc.) will be transported to the Decon Pad for decontamination, if necessary.
 - D. Incidental equipment, such as fire extinguishers, shovels, pumps, and reusable PPE, will be removed to the Decon Pad and thoroughly decontaminated, if necessary.
- Liquids and other materials resulting from decontamination operations will be appropriately managed in accordance with the WAP.
- Fire extinguishers will be inspected in accordance with the Facility Inspection Plan before being placed back in service.

7.3.4 Earthquakes

The USEN facility is located ~10 miles west of the Furnace Creek Fault Zone, and ~100 miles south of the Las Vegas Shear Zone. The following contingency response measures will be conducted in the event of significant seismic activity to the extent required by the EC:

- 1. Communication between key facility personnel and the EC will be immediately established;
- 2. Facility personnel will exit buildings, to an open area, if the building's structural integrity appears to be failing;
- 3. Facility personnel in operational areas will immediately halt or alter operations;
- 4. Heavy equipment operators will shut down equipment and egress to a safe open area;
- 5. Personnel located in the landfill will move away from the trench walls to the center open area and remain until the earthquake and associated initial after-shocks have dissipated;
- 6. Immediately following the earthquake and initial after-shocks, all personnel will proceed directly to the designated muster area;
- 7. The EC will account for all facility personnel;
- 8. Qualified personnel will administer first aid to injured personnel. Injured personnel will be transported for medical treatment, if necessary;
- 9. The EC will designate inspection teams and begin necessary measures to appraise facility damage;
- 10. Inspection of the facility will be conducted in an organized manner and will include the following areas:
 - The active landfill will be inspected for wall failure, cracks, exposed waste, severe depression in the floor and visible gas vapor emission.
 - Inactive cells will be inspected for cap integrity and fugitive visible emissions.
 - All access roads will be inspected for cracks and severe depressions.
 - Facility perimeter fencing will be inspected for integrity.
 - All electrical and utility systems will be inspected for operational effectiveness.
 - All facility equipment will be inspected for operational integrity.
 - All monitoring wells and sumps will be inspected for integrity.
 - The PCB processing area will be inspected for structural integrity of the building, flooring, valves, pipes, tanks, and containment controls. Signs of cracks, leaks or malfunction will be reported to the EC.
 - The LTTD Treatment System and propane tank and ancillary equipment will be inspected for leaks, cracks or malfunction.
- 11. The EC will ensure that all inspection personnel are properly equipped with PPE.
- 12. In the event that a fire and/or explosion result from the earthquake, subsequent contingency response will be in accordance with Section 3.1 of this plan.
- 13. In the event that a release of hazardous material occurs, subsequent contingency response will be in accordance with Section 3.2 of this plan.
- 14. The EC will then initiate any remedial actions necessary to bring the facility up to operational readiness.

15. All necessary reports will be submitted in accordance with Section 7.0 of this plan.

7.4.0 Evacuation Plan

All emergencies require prompt and deliberate action. The EC will be responsible for determining if a facility evacuation is required. In the event that this determination is made, the following actions will be taken:

- 1. The emergency horns will be activated twice. This is the primary signal for immediate facility evacuation. In addition, radio communications will be established and the verbal order for evacuation will be given.
- 2. All facility personnel will immediately don proper PPE, if required, and proceed to the primary evacuation route (Appendix B).
- 3. All evacuations will be coordinated by the EC in such a manner as to minimize potential exposure (i.e., up-wind egress).
- 4. All facility visitors and contractors will exit the facility immediately, under the direction of the EC.
- In the event that evacuation by the primary designated route is not possible (due to blockage by releases or fire), the EC will authorize the sacrifice of facility fencing by use of heavy equipment or motor vehicles to create alternate routes. All personnel evacuating the facility in this manner will immediately proceed to the evacuation muster area when clear of danger or to an alternate muster area designated by the EC.
- 6. When the evacuation is complete, the EC will immediately account for all facility personnel, visitors and contractors.
- 7. No attempt will be made to find personnel unaccounted for, if it involves the endangering of lives of others by re-entry into the facility.
- 8. Re-entry into the facility will only be made after the EC gives clearance.

7.5.0 Equipment Requirements

The facility will maintain sufficient safety and emergency equipment for immediate response to most emergency situations. All facility communications and alarm systems, fire extinguishers, spill control equipment and decontamination equipment will be inspected and maintained in accordance with the Facility Inspection Plan.

7.5.1 Emergency Response Equipment

For a more comprehensive list of emergency equipment, see Appendix D.

7.5.2 Safety Equipment

The facility will maintain sufficient safety equipment to provide for immediate response to emergency situations.

7.5.2.1 Respiratory Protection

Air purifying half- or full-face respirators with appropriate cartridges will be available in the facility offices and stocked at the operational areas. A specific list of available equipment and locations include:

- Air purifying respirators (issued to each operational employee);
- Self-contained breathing apparatus (SCBAs) (located in the trench shed, safety van, stabilization building and PCB Building);
- Spare bottles for SCBAs (located in the safety van); and
- Cartridges for air purifying respirators (located in the safety office storage area, PCB Building, stabilization building and safety van).

7.5.2.2 Personal Protective Equipment

Available PPE, in addition to the PPE issued to operational employees, includes:

- Tyvek[™] outer garments (located in the stabilization building, trench shed, PCB Building, maintenance building and safety van);
- Chemical-resistant suits (located in the safety van, PCB Building and stabilization building);
- Chemical-resistant nitrile gloves (located in the trench shed, stabilization building, safety van, PCB Building and site laboratory);
- Face shields (located in the PCB Building); and
- Chemical resistant over-boots for safety shoes (located in the PCB Building, safety van, Truck Wash Pad and Safety office storage area).

7.5.2.3 Fire Extinguishers

Portable fire extinguishers, rated for class "ABC" fires, are available at multiple locations on-site. Specific lists of units (and respective locations) include:

- ABC units on all heavy equipment;
- ABC units stored in the trench shed on the loading dock and safety van;
- 150-pound BC unit at unloading dock in active cell;
- 150-pound BC unit at LTTD area;
- 250-pound Ansul at the stabilization building;
- 250-pound Ansul near the Pump #1 Pump house

7.5.2.4 Heavy Equipment and Vehicles

The facility routinely utilizes multiple pieces of heavy equipment and vehicles (such as trucks) to support on-site operations and this equipment is available for emergency

response efforts. Typical equipment used on-site includes track-hoes, bulldozers, water trucks, forklifts, etc. Although this equipment is available on-site, it is not for "emergency response" purposes, per se, and is routinely exchanged for other similar equipment when its economic life is complete. Therefore, although this equipment is on-site, it is not listed here.

7.5.2.5 Spill Control and Response Equipment

A specific list of spill control and response equipment, in addition to on-site heavy equipment, includes:

- Recovery drums (outside the PCB Building);
- Absorbent material for containment and solidification (outside the PCB Building);
- Spill control pads (PCB Building and facility laboratory); and
- Shovels (PCB Building, wash pad).

7.5.2.6 Decontamination Equipment

Decontamination of contaminated equipment will typically take place at the Decon Pad, and all decontamination run-off will be collected in the wash pad holding tank. Additional equipment typically available for decontamination includes:

- High pressure and steam cleaning units (kept at the Decon Pad);
- Decon water soluble cleaning solution (PCB Building);
- Sponges and mops (PCB Building), and
- Portable and fixed emergency deluge showers and eye wash stations (fixed units located at the Waste Consolidation and WCSA, PCB Building, stabilization area, Decon Pad and Lab).

7.5.2.7 First Aid Supplies

Typically available first aid supplies include:

- A complete emergency trauma kit (located in the safety van and the Lab);
- Basic first aid kits (located in WCSA, PCB Building, and Stabilization Office);
- One stretcher (located in the safety van); and
- One burn pack (located in the safety van).

7.5.2.8 Water For Fire Control

The facility maintains a 20,000 gallon water storage tank located adjacent to the PCB building and a water storage pond located slightly north of the main access gate.

Other fire fighting capabilities includes two mechanical foam spraying units. One is located in Trench 12 while the other is portable and is mounted on the back of a ATV or other facility vehicle.

7.5.2.9 Internal Communication Systems

Internal communications consist of three (3) independent systems. The primary system is an emergency warning siren. The system consists of two (2) high-intensity warning horns, one (1) located at the PCB Building, and one (1) in the office compound area. The second system consists of radio units. This system consists of a minimum of eight (8) hand-held units located throughout the facility. All radios are interfaced for monitoring and communication purposes. The EC will monitor at least one unit at all times during normal facility operations. The third system consists of a telephone intercom system.

7.5.2.10 External Communication Systems

External communications for summoning outside emergency assistance will be accomplished by telephone. There will be a minimum of six (6) telephones readily available for this purpose. One (1) will be located in the laboratory facility, one (1) in the Facility Manager's office, one (1) in the break area, and three (3) in the Administrative office.

7.6.0 Plan Distribution/Coordination Agreements

The following facilities and agencies are in possession of copies of the Emergency Coordinator Phone Number List (Appendix A.) These agencies were invited to participate in an orientation intended to familiarize response personnel with the facility layout, properties of the wastes handled at the facility and associated hazards. Each agency was asked to review and comment on the plan and establish specific actions that they will take in response to an emergency.

- 1. Beatty Volunteer Fire/Rescue:
- 2. Beatty Ambulance Service:
- Beatty Medical Clinic;
- Beatty Substation Nye County Sheriff; and
- Mercy Air Ambulance Service.

A copy of the coordination agreement letter provided to each agency is included as Appendix C.

7.7.0 Reports

As soon as possible after implementation of the Contingency Plan, the Emergency Coordinator, or designee, will record the time, date, and details of the incident. USEN will orally report to the Nevada Division of Environmental Protection (NvDEP) any incident requiring implementation of the Contingency Plan. The NvDEP and the National Response Center will be notified of any incident involving a release to the environment of hazardous waste, pollutant or contaminant in a quantity equal to, or greater than the reportable quantity specified by 40 CFR Part 302.

The oral reports described above will be provided as soon as possible after becoming aware of the release, but no later than 24 hours following the incident. However, the EC must notify the NvDEP that the facility is in compliance with the following items before operations are resumed in the affected area(s) of the facility:

- No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
- 2. All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before operations are resumed. In this case, the EC may substitute equivalent emergency equipment in the affected area while repairing, replacing, or recharging used emergency response equipment.

A written report providing details on any incident requiring implementation of the Contingency Plan will be submitted to the NvDEP Administrator within 15 days. The following information will included in the written notification to the Administrator:

- 1. Name, address and telephone number of the owner/operator of the facility;
- 2. Name, address and telephone number of facility;
- 3. Date, time, and type of incident (e.g.; fire, explosion);
- Name and quantity of material(s) involved;
- 5. The extent of injuries, if any;
- An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- 7. Estimated quantity and disposition of recovered material that resulted from the incident.

7.8.0 Plan Modification

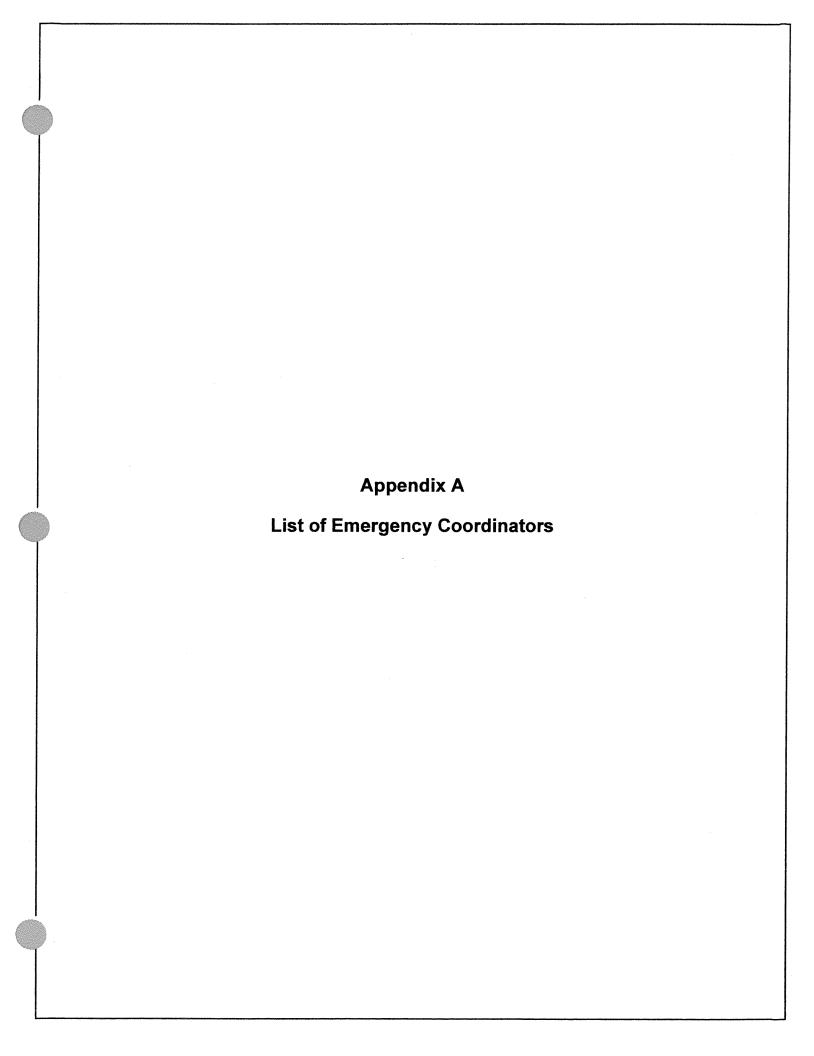
The Emergency Coordinator, or designee, may find it necessary to adapt the Contingency Plan to a specific emergency situation in order to adequately protect human health or the environment. In addition, the Contingency Plan will be reviewed and amended, if necessary, whenever:

- The facility permit is revised;
- The plan fails in an emergency;
- The facility changes in its design, construction, operation, maintenance, or other circumstances – in a way that materially increases the potential for fires, explosions, or

releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

- 4. The list of emergency coordinators changes; or
- 5. The list of emergency equipment changes.

Copies of the modified plan will be distributed as described in Section 6.0.



CONTINGENCY PLAN NOTIFICATION LIST

US ECOLOGY NEVADA, INC. BEATTY, NEVADA

BEATTY FACILITY OFFICE

(800) 239-3943

or (775) 553-2203

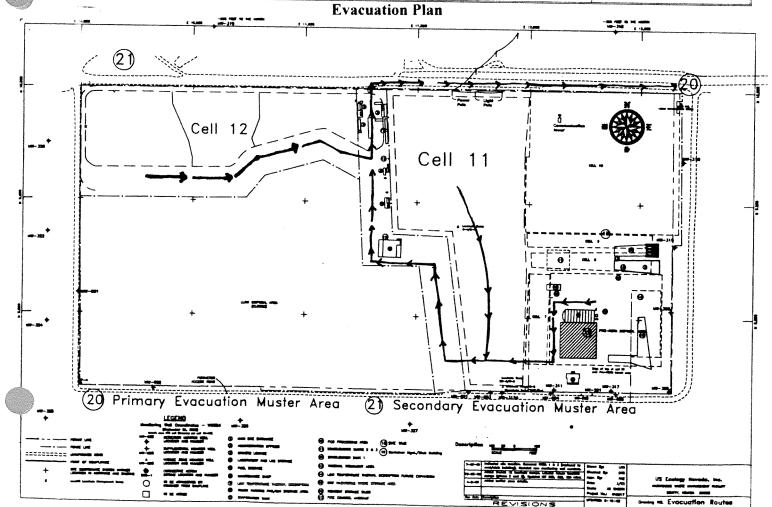
CORPORATE OFFICE - BOISE, ID

(800) 590-5220

or

(208) 231-0135

EMERGENCY COORDINATOR	NAME	STREET ADDRESS	HOME PHONE
Primary Coordinator	Robert Marchand	1225 A Avenue North Beatty, Nevada 89003	775-553-2367 702-280-2596-cell
First Alternate	Scott Wisniewski	1100 A Avenue North B3 Beatty, Nevada 89003	303-913-3029-cell
Second Alternate	Roberto Guerra	1651 W. Monk Avenue Beatty, Nevada 89003	775-553-2744 702-812-0874-cell
Third Alternate	Dan Church	4921 Laughlin Road Pahrump, NV 89048	775-990-9826-cell
Health & Safety Manager	Tyree Simmons	5386 E. Cansano St Pahrump, NV 89061	812-470-4987-cell 812-746-6676-alternate

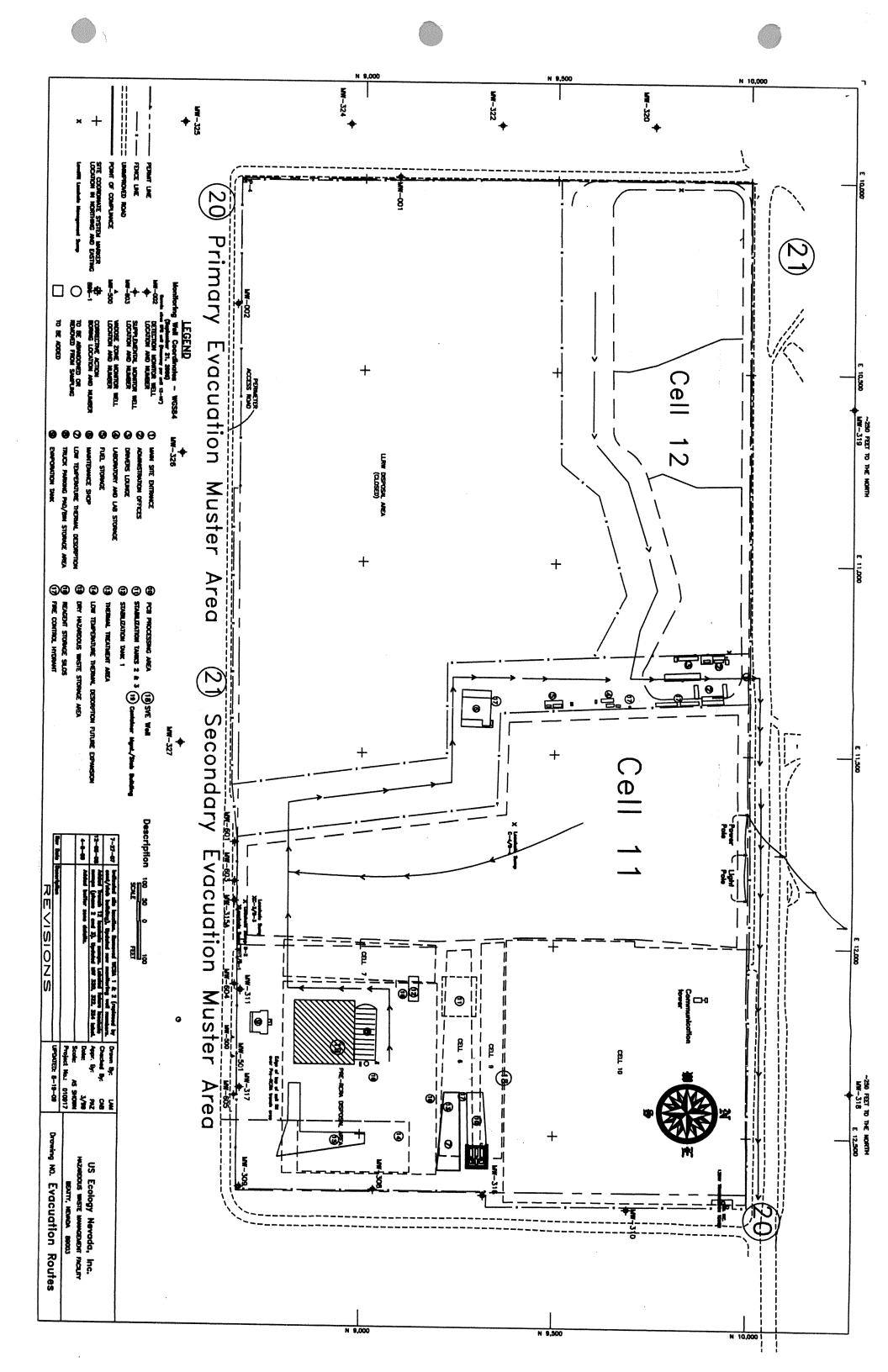


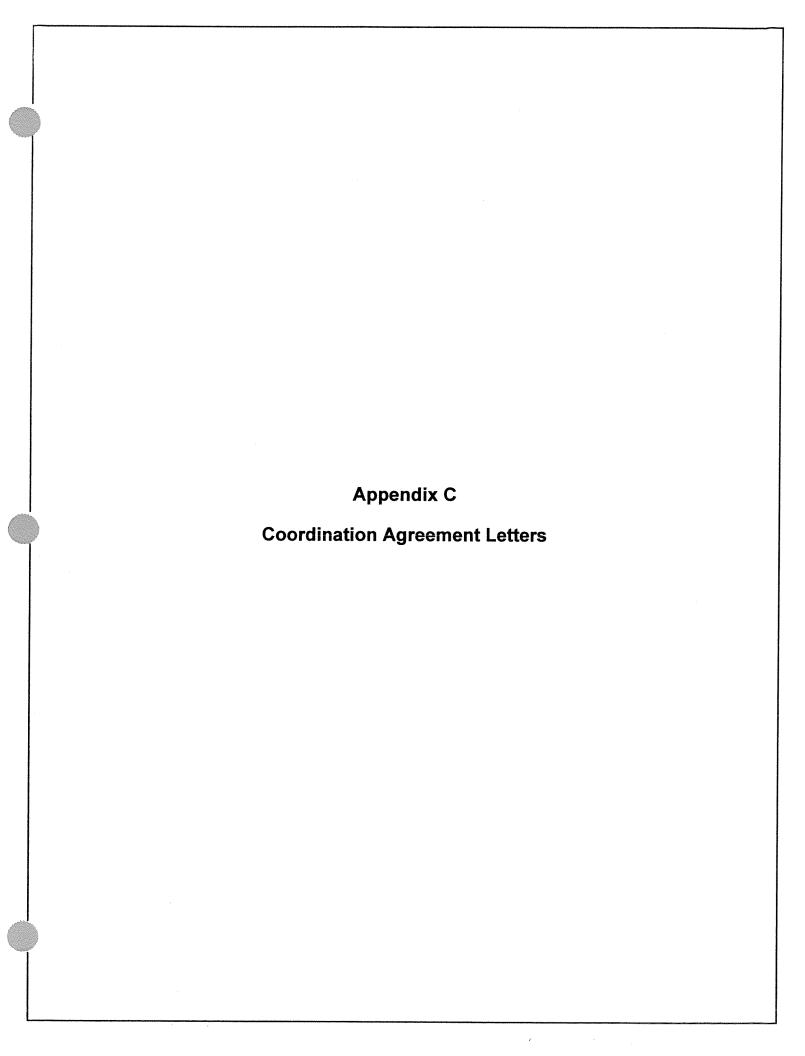
FUNCTION	NAME	STREET ADDRESS	HOME PHONE
Vice President of Operations	Simon Bell	300 E. Mallard, Ste. 300 Boise, ID 83706	208-890-2417-cell

RESPONSE & REGULATORY AGENCIES

Beatty Volunteer	Fire/Rescue/Ambulance Service	DIAL 911 or	775-553-2345
Beatty Medical C	linic		
Nye County Sheriff's Office (Beatty Substation)		DIAL 911 or	775-553-2208 775-553-2345
Nye County Emergency Services			
State of Nevada:	Division of Environmental Protection (S	Spill Reporting)	775-751-4278
	Radiological Health Section	- Francisco (Control of Control o	775-687-9485
Nevada Highway Patrol		CALL DISPATCH	775-687-5394
Nevada Highway Patrol (Elko)		oned bisi Aren	775-688-2500
University Medica	l Center (Las Vegas)		775-753-1111
	icopter (Mercy Air)		702-383-2000
Nevada Department of Emergency Management			775-751-1114
National Response	_		775-687-4240
			800-424-8802

Appendix B **Evacuation Routes Map**





www.americanecology.com



October 7, 2009

Beatty Ambulance Service PO Box 875 Beatty, Nevada 89003

Dear Sir/Madam,

As you are aware, US Ecology operates a chemical waste disposal facility near the location of your organization. The U.S. Environmental Protection Agency (USEPA) regulations pertaining to hazardous waste disposal require US Ecology to familiarize local emergency response personnel with our site operations and obtain verification from you that your organization will respond to any request for emergency assistance.

This is the second letter that has been sent to your facility. If we do not receive this signed letter back we will assume that your entity will not respond to any requests for emergency assistance made by our facility. To acknowledge that you will provide such services, please have a representative of your agency sign the appropriate spaces provided below, date, and send back in the provided envelope.

Also, this letter constitutes US Ecology's formal request that your agency participate in an orientation session, held at your convenience, dealing with the facility layout, potential hazards and special situations which could be encountered during an emergency response. Attached is a copy of US Ecology's Emergency Contingency Plan for your review. Should you be interested in an orientation or if you require additional information regarding this notice, please contact me at 775-751-6788 X 127.

Sincerely,

Scott Wisniewski

Environmental Compliance/H&S Manager

Enclosure

Cc:

Mr. Sree Kailash, P.E., CEM, Staff Engineer-NDEP

Mr. Bob Marchand, General Manager - US Ecology

Mr. Richard O'Hara, Environmental Health & Safety Director - American Ecology

Mr. Mark John, Operations Manager

The BUATT YOU. AMBLIANCE 5 Wavill respond to any US Ecology request for

emergency assistance.

Date: 1/3/10

Signed:

9 MOULANICE SERVICES

Ø

Decline orientation session

www.americanecology.com



June 15, 2009

Nye County Sheriff Beatty Sub Station PO Box 805 Beatty, Nevada 89003

Dear Sir/Madam,

As you are aware, US Ecology operates a chemical waste disposal facility near the location of your organization. The U.S. Environmental Protection Agency (USEPA) regulations pertaining to hazardous waste disposal require US Ecology to familiarize local emergency response personnel with our site operations and obtain verification from you that your organization will respond to any request for emergency assistance.

To acknowledge that you will provide such services, please have a representative of your agency date and sign the appropriate spaces provided below.

Also, this letter constitutes US Ecology's formal request that your agency participate in an orientation session, held at your convenience, dealing with the facility layout, potential hazards and special situations which could be encountered during an emergency response. Attached is a copy of US Ecology's **Emergency Contingency Plan** for your review. Should you be interested in an orientation or if you require additional information regarding this notice, please contact me at 775-751-6788 x 127.

Sincerely,

Scott Wisniewski

Environmental Compliance/H&S Manager

Enclosure

Cc:

Mr. Sree Kailash, P.E., CEM, Staff Engineer-NDEP

Mr. Bob Marchand, General Manager - US Ecology

Mr. Richard O'Hara, Environmental Health & Safety Director - American Ecology

Mr. Mark John, Operations Manager

The NYE COUNTY SHERIFF'S OFFICE will respond to any US Ecology request for emergency assistance.

Data: /. /

6/23/09

Signed.

RANK JARVIS. LT

□ Decline orientation session

www.americanecology.com



June 15, 2009

Beatty Volunteer Fire Department PO Box 113 Beatty, Nevada 89003

Dear Sir/Madam,

As you are aware, US Ecology operates a chemical waste disposal facility near the location of your organization. The U.S. Environmental Protection Agency (USEPA) regulations pertaining to hazardous waste disposal require US Ecology to familiarize local emergency response personnel with our site operations and obtain verification from you that your organization will respond to any request for emergency assistance.

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Scott Wisniewski
Environmental Compliance/H&S Manager

Enclosure

Sincerely,

Mr. Sree Kailash, P.E., CEM, Staff Engineer-NDEP

Mr. Bob Marchand, General Manager - US Ecology

Mr. Richard O'Hara, Environmental Health & Safety Director - American Ecology

Mr. Mark John, Operations Manager

The _____ will respond to any US Ecology request for

emergency assistance

e: 6-19-07

Signed:

Decline orientation session

800/239-3943 775/553-2203 Fax: 775/553-2742

www.americanecology.com



June 15, 2009

Beatty Medical Clinic PO Box 431 Beatty, Nevada 89003

Dear Sir/Madam,

RECEIVED

JUN 2 6 2009

NEVADA HEALTH CENTERS, INC.

As you are aware, US Ecology operates a chemical waste disposal facility near the location of your organization. The U.S. Environmental Protection Agency (USEPA) regulations pertaining to hazardous waste disposal require US Ecology to familiarize local emergency response personnel with our site operations and obtain verification from you that your organization will respond to any request for emergency assistance.

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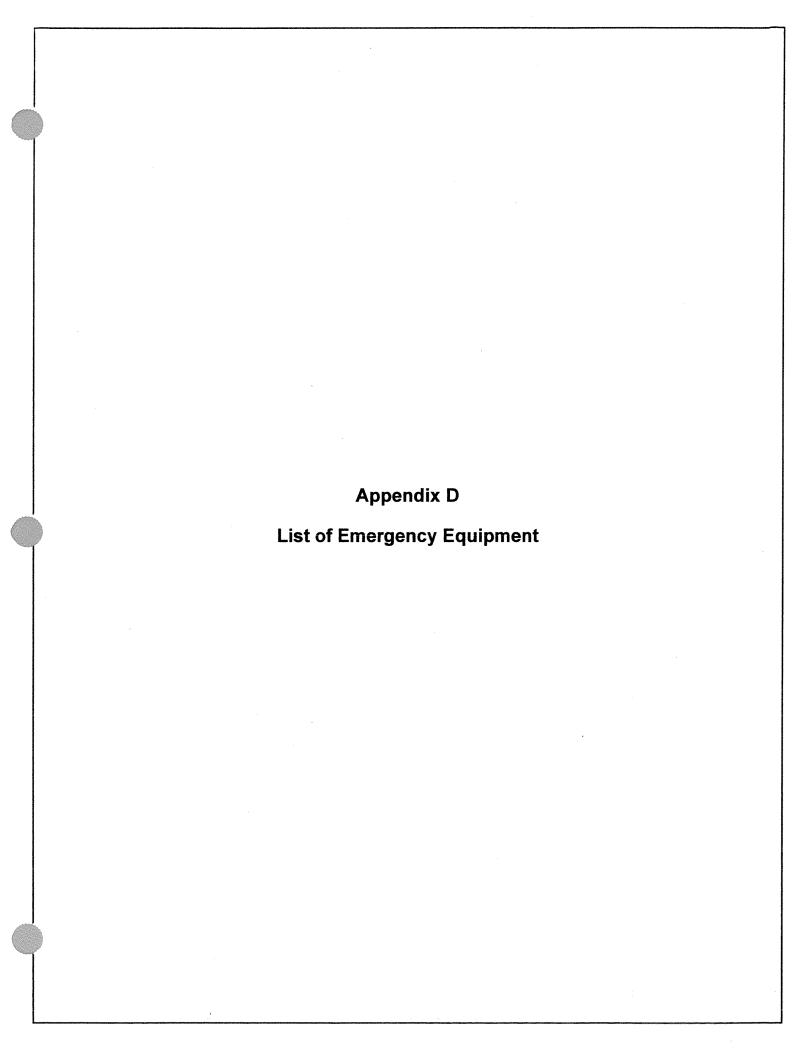
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Scott Wisniewski
Environmental Compliance/H&S Manager

Enclosure
Cc: Mr. Sree Kailash, P.E., CEM, Staff Engineer-NDEP
Mr. Bob Marchand, General Manager – US Ecology
Mr. Richard O'Hara, Environmental Health & Safety Director – American Ecology
Mr. Mark John, Operations Manager

The Laty Medical Cluwill respond to any US Ecology request for emergency assistance.

Date: Signed:



List of Emergency Equipment (Typical)				
Equipment	Location	Physical Description / Capabilities		
SCBAs	Safety Van/Trailer, Stab Tanks, PCB Bldg, & Landfill	Face piece covering eyes & air supply of 30 minutes. NIOSH approved. These units are not approved for fire fighting.		
Spare Bottles for SCBA	Safety Van/Trailer	45 scf @ 2,200 psi		
Protective Outer Garments	Safety Storage Area, Stabilization Area, PCB Bldg., Landfill	One-piece coveralls		
Nitrile Gloves	Safety Van/Trailer, Stabilization Area, PCB Bldg., Landfill	Chemical resistant gloves		
Face Shields	PCB Bldg., Safety Storage Area	Hard plastic shield for protecting eyes from splashes		
Booties / Rubber Boots	Safety Storage Area, PCB Bldg.	Water or chemical resistant boots or covers		
Fire Extinguishers	Heavy Equipment, Stabilization Area, PCB Bldg., Landfill	Various sizes and types for fighting incipient fires		
Overpack Drums	PCB Bldg.	For containing waste, spill residues		
Absorbents / Pozzolons	Stabilization Area, PCB Bldg.	These materials are soils or materials for sorption of liquids		
Spill Control Pads	PCB Bldg., CMS Bldg & Lab	These materials are for absorbing liquids		
Emergency Showers & Eye Wash Units	Various locations	Deliver water for drenching contaminated personnel		